

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS (BOSTON)**

CHARLES BROWN, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

VS.

BIOGEN IDEC, INC., WILLIAM RASTETTER, and
JAMES MULLEN,

Defendants.

CARY GRILL, Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

VS.

BIOGEN IDEC, INC., WILLIAM RASTETTER and
JAMES MULLEN,

Defendants.

ROCHELLE LOBEL, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

VS.

BIOGEN IDEC, INC., WILLIAM RASTETTER and
JAMES MULLEN,

Defendants.

**DECLARATION OF NANCY FREEMAN GANS IN SUPPORT OF THE MOTION
OF THE BIOGEN INSTITUTIONAL INVESTOR GROUP FOR CONSOLIDATION,
APPOINTMENT OF LEAD PLAINTIFF, AND APPROVAL OF LEAD
PLAINTIFF'S SELECTION OF CO-LEAD COUNSEL AND LIAISON COUNSEL**

I, Nancy Freeman Gans, under penalties of perjury, hereby declares:

1. I am a partner of the law firm of Moulton & Gans, P.C. ("Moulton & Gans"). I submit this declaration in support of the motion of the Biogen Institutional Investor Group for Consolidation, Appointment As Lead Plaintiff, And Approval Of Lead Plaintiff's Selection Of Co-Lead Counsel and Liaison Counsel.

2. Attached hereto as Exhibit A is a true and correct copy of the first published PSLRA notice by plaintiff in the action *Brown v. Biogen Idec, Inc., et al.* No. 1:05-cv-10400 (RCL) (D. Mass. filed on March 2, 2005). Notice was published on the *PR Newswire*.

3. Attached hereto as Exhibit B are true and accurate copies of the certifications of The New Jersey Carpenters Pension and Annuity Funds, Folksom Asset Management, Third Millennium Trading, LLP, the Deerfield Beach Non-Uniformed Municipal Employees Retirement Plan and the Plumbers and Pipefitters Local No. 520 Pension Fund (collectively, the "Biogen Institutional Investor Group").

4. Attached hereto as Exhibit C is a chart analyzing the Biogen Institutional Investor Group's financial interest in this action.

5. Attached hereto as Exhibit D is the firm resume of Milberg Weiss Bershad & Schulman LLP.

6. Attached hereto as Exhibit E is the firm resume of Entwistle & Cappucci, LLP.

7. Attached hereto as Exhibit F is the firm resume of Moulton & Gans, P.C.

Dated: May 2, 2005
New York, New York

/s/ Nancy Freeman Gans
NANCY FREEMAN GANS

CERTIFICATE OF SERVICE

I, Nancy Freeman Gans, hereby certify that a true copy of the above document was served upon the attorney of record for each party.

/s/ Nancy Freeman Gans
Nancy Freeman Gans